



U.S. Department of Justice

*United States Attorney
Eastern District of New York*

ADR
F. #2025R00082

*271 Cadman Plaza East
Brooklyn, New York 11201*

October 7, 2025

By Email and ECF

Samuel Jacobson, Esq.
Federal Defenders of New York
One Pierrepont Plaza, 16th Floor
Brooklyn, NY 11201

Re: United States v. Sharon Gohari
Criminal Docket No. 25-183 (AMD)

Dear Counsel:

Enclosed please find discovery in accordance with Rule 16 of the Federal Rules of Criminal Procedure, which is being provided pursuant to the Stipulation and Order entered by the Court on June 12, 2025, *see* ECF No. 13 (the "Protective Order"). The government also requests reciprocal discovery from the defendant.

The discovery consists of preliminary draft translations of communications from the defendant's devices, as set forth below.¹

- Draft machine translations of communications between the defendant and a co-conspirator on the Telegram messaging application, Bates-numbered SG_000508 – SG_000525;
- Draft machine translations of communications between the defendant and a co-conspirator on the WhatsApp messaging application, Bates-numbered SG_000526 – SG_000527;

¹ Any draft translations are provided by the government to assist the defendant in his review of discovery material and are subject to change.

- Draft linguist translations of communications between the defendant and a co-conspirator on the WhatsApp messaging application, Bates-numbered SG_000528 – SG_000529;
- Draft linguist translations of communications between the defendant and a co-conspirator on the WhatsApp messaging application, Bates-numbered SG_000530 – SG_000531; and
- Draft machine translation of a WhatsApp group chat involving the defendant, Bates-numbered SG_000532.

Very truly yours,

JOSEPH NOCELLA, JR.
United States Attorney

By: /s/
Andrew D. Reich
Assistant U.S. Attorney
(718) 254-6452

Enclosures

cc: Clerk of the Court (AMD) (by ECF) (without enclosures)